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## Attorneys for Comcast Cable Communications, LLC

#### BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky
Mountain Power for Authority to Increase its
Retail Electric Utility Service Rates in Utah
and for Approval of its Proposed Electric
Service Schedules and Electric Service
Regulations

Docket No. 10-035-124

COMCAST CABLE
COMMUNICATIONS, LLC'S
FIRST SET OF DATA REQUESTS
TO ROCKY MOUNTAIN POWER

OR DOCKY MOUNTAIN POWER

Comcast Cable Communications, LLC, on behalf of its operating subsidiaries and affiliates ("Comcast"), hereby submits this First Set of Data Requests in the above-captioned matter to Rocky Mountain Power ("RMP"). Comcast requests that RMP provide its responses to the Data Requests within the time periods specified by the Public Service Commission of Utah.

## I. INSTRUCTIONS

1. In accordance with Rule 33 of the Utah Rules of Civil Procedure, please answer each data request separately and fully in writing under oath, unless it is objected to, in which event, state the reasons for objection in lieu of an answer, and answer each other portion of the data request to which no objection is asserted. Following each answer, please identify the person

responsible for the answer, and following each objection, please identify the attorney objecting to the data request. If you produce business records in lieu of an answer to a data request, please specify the records from which the answer may be derived or ascertained in sufficient detail to permit us to locate and to identify, as readily as you can, the records from which the answer may be ascertained.

- 2. If you are unable to answer a data request fully, please submit as much information as is available and explain why your answer is incomplete. If precise information cannot be supplied, submit (a) your best estimate or judgment, so identified, and set out the source or basis of the estimate or judgment, and (b) provide such information available to you as best approximates the information requested. Where incomplete answers, estimates or judgments are submitted, and you know of or have reason to believe there are other sources of more complete or accurate information, please identify or describe those other sources of information.
- 3. In responding to the data requests, please preface each answer by restating the request to which the answer is addressed. Where a request for information includes subparagraphs or subdivisions, please answer each subparagraph or subdivision separately.
- 4. These data requests are continuing in nature and include all documents and information prepared or received by you between the date of receipt of this request and the date of the Pubic Service Commission hearing on this matter.
- 5. True and correct copies of all documents responsive and related to the data requests are to be produced, identified and submitted to Comcast within the time periods specified by the Public Service Commission.

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## II. DEFINITIONS

The following definitions shall apply to these data requests:

- 1. The terms "and" and "or" as used herein are inclusive, and shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the requests matters that might otherwise be construed to be outside its scope.
  - 2. The term "any" means one or more.
- 3. The term "pole attachment" means any attachment by a cable company or provider of telecommunications service to a pole, duct, conduit, or right-of-way owned or controlled by a utility.
  - 4. The term "including" means including but not limited to.
- 5. The terms "relate to" and "relating to" mean, without limitation, to make a statement about, refer to, discuss, describe, reflect, contain, identify or in any way pertain to, in whole or in part, or being logically, legally or factually related.
- 6. The term "you" means (a) the person on which this request is served, its predecessors, successors, subsidiaries, parents, divisions and affiliates and (b) present and former partners, officers, directors, employees, agents, and other persons acting on behalf of it or one or more of its predecessors, successors, subsidiaries, parents, divisions or affiliates, including but not limited to employees, independent contractors, consultants, attorneys, or other agents having possession, custody or control of documents or information called for by this request.
- 7. The singular form of a noun or pronoun shall be considered to include the plural form of the noun or pronoun, and vice versa.
- 8. Regardless of the tense employed, all verbs shall be read as applying to the past, present and future as is necessary to make any paragraph more, rather than less, inclusive.

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DMWEST #8225453 v1

## DATA REQUESTS

## REQUEST NO. 1

Please explain how "Administrative Support costs," as that phrase is used in Jeffrey Kent's testimony, differ from "administrative and general expenses" of the "Carrying Charge Rate" in Utah Admin. Code Rule R746-345-5.A.2.a.

### REQUEST NO. 2

Please explain how "Administrative Costs," as that phrase is used in Jeffrey Kent's testimony, differ from "administrative and general expenses" of the "Carrying Charge Rate" in Utah Admin. Code Rule R746-345-5.A.2.a.

## REQUEST NO. 3

Please explain how the additional component to the pole attachment rate formula proposed in Jeffery Kent's testimony would alter the rental rate formula proscribed in Utah Admin. Code Rule R746-345-5.A.1, and where such data is publically available.

#### REQUEST NO. 4

Please identify the FERC account(s) to which the "administrative and general expenses" settle under the "Carrying Charge Rate," as defined in Utah Admin. Code Rule R746-345-5.A.2.a.

#### REQUEST NO. 5

- (a) For each of the following items, as such following line items appear in the tables provided in your response to the Utah Division of Public Utilities Data Request 7.69, please describe what costs comprise:
  - (i) "Billing Admin"
  - (ii) "Joint Use ASC Group"

- (iii) "JU Application Management"
- (iv) "JU Make Ready Management"
- (v) "JU Post Inspection Processing"
- (vi) "JU Licensee Support"
- (vii) "JU Foreign Owned Pole Management"
- (viii) "JU Pole Work Management"
- (ix) "JU FPI Management"
- (x) "JU Other Expenses"
- (xi) "JU Contact Rental"
- (xii) "JU Contract Management"
- (xiii) "Non-Joint Use Related Work"
- (b) Please identify the specific services that are performed in support of joint use licensees for each of the costs outlined in your response to REQUEST No. 5(a).
- (c) Please identify the FERC account(s) to which each of the costs outlined in your response to REQUEST No. 5(a) settle.
- (d) If your response to REQUEST No. 5(c) includes FERC Account 588, please identify the category or sub-category of FERC Account 588 to which each of the costs settle.

# DATED this 5th day of May, 2011.

# COMCAST CABLE COMMUNICATIONS, LLC

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## CERTIFICATE OF SERVICE Docket No. 10-035-124

I hereby certify that on the 5th day of May, 2011, a true and correct copy of COMCAST

## CABLE COMMUNICATIONS, LLC'S FIRST SET OF DATA REQUESTS TO ROCKY

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